

Not Relevant

From: Jeffrey H Birk <jeffrey.birk@basf.com>
Sent: Friday, February 18, 2022 8:25 AM
To: Schmid, Emily <Schmid.Emily@epa.gov>
Cc: Stephanie Ann Binns <stephanie.binns@basf.com>; Roe, Lindsay <Roe.Lindsay@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>
Subject: RE: [EXT] RE: Engenia supplemental labeling for states?

Hello Emily,

BASF is providing the revised proposed state specific supplemental Engenia herbicide labels for Iowa and Minnesota.

The expiration date for the labels is December 20, 2025, consistent with the registration expiration date for Engenia herbicide. The states have reviewed this proposal and agreed to that date.

The labels continue to be written specifically for the dicamba-tolerant soybean use since cotton is not grown in IA and MN and the inclusion of DT cotton on these labels would be inappropriate and possible confusing for these northern states where cotton is not grown. Also, it is doubtful if the state officials and experts that help develop these additional restrictions for IA and MN even considered what restrictions they might consider necessary for a DT cotton use in their state. As we see with the full Engenia labeling the DT cotton and DT soybean use restrictions are not the same.

Specific to MN the temperature cutoff does apply to the whole state by default, as does the June 20 use cutoff date. No need to say that it applies to the whole state, when that is the accept default status, unless otherwise specified.

BASF is in the process of creating a website (www.EngeniaHerbicide.com/labels) that will prominently contain any state specific labeling. Consistent with this the Engenia herbicide labeling has been amended to include the appropriate reference to this website and the requirement that users go to this website for any potential state specific restrictions within 30 days prior to making an Engenia application. These proposed new Use Directions have been prepared as a supplemental Engenia herbicide label for review. The proposed amended Engenia herbicide labeling and accompanying supplemental label should be submitted via the Portal by early next week.

For your review I have attached clean and annotated versions of the revised IA and MN supplemental labels.

Please review and let me know if you have any questions or concerns.

Enjoy your long weekend,

Jeff

Jeffrey Birk
Product Registration Manager

Phone: +1 919 547-2622, Mobile [REDACTED] PII [REDACTED], Fax: +1 919 547-2850, Email: jeffrey.birk@basf.com
Postal Address: BASF Corporation, , 26 Davis Drive, 27709-3528 Research Triangle Park, United States



BASF Corporation

From: Schmid, Emily <Schmid.Emily@epa.gov>
Sent: Tuesday, February 15, 2022 12:31 PM
To: Jeffrey H Birk <jeffrey.birk@basf.com>
Cc: Stephanie Ann Binns <stephanie.binns@basf.com>; Roe, Lindsay <Roe.Lindsay@epa.gov>;
Meadows, Sarah <Meadows.Sarah@epa.gov>
Subject: RE: [EXT] RE: Engenia supplemental labeling for states?

Hi Jeff,

Thank you for sending this and the one for Iowa. We have reviewed the labels and have a few comments (PDFs attached).

It has been decided that the best way to get this information out to the user is to have each registrant set up a website that will hold supplemental labels and add a general direction to the master label that says, "You must check [X website] for state specific restrictions within 30 days of application of this product." That way, if there are changes to these supplemental labels, or if other states want to add supplemental labels, the master label won't need to be updated every time. Additionally, we'll need a supplemental label with this direction since some of the product is already in the hands of the users and can't be relabeled with this direction. You can submit both of those as a fast track label amendment.

If you have any questions about this, or about any of our comments, please feel free to reach out.

Best regards,
Emily

From: Jeffrey H Birk <jeffrey.birk@basf.com>
Sent: Wednesday, January 12, 2022 9:30 AM
To: Schmid, Emily <Schmid.Emily@epa.gov>
Cc: Stephanie Ann Binns <stephanie.binns@basf.com>
Subject: RE: [EXT] RE: Engenia supplemental labeling for states?

Hello Emily,

I wanted to let you know that BASF has submitted a proposed Engenia supplemental label specific to Minnesota's requested additional use restrictions.

I have attached copies of the submission documents along with the following submission reference.

CDX_2022_000474

Please let me know if you have any immediate questions or concerns.

Thanks,

Jeff

Jeffrey Birk

Product Registration Manager

Phone: +1 919 547-2622, Mobile: [REDACTED] PII, Fax: +1 919 547-2850, Email: jeffrey.birk@basf.com

Postal Address: BASF Corporation, , 26 Davis Drive, 27709-3528 Research Triangle Park, United States



We create chemistry

BASF Corporation

From: Schmid, Emily <Schmid.Emily@epa.gov>

Sent: Wednesday, January 5, 2022 10:27 AM

To: Jeffrey H Birk <jeffrey.birk@basf.com>

Subject: [EXT] RE: Engenia supplemental labeling for states?

Hi Jeff,

Not Part of Administrative Record

Best regards,

Emily

From: Jeffrey H Birk <jeffrey.birk@basf.com>

Sent: Tuesday, January 04, 2022 11:43 AM

To: Schmid, Emily <Schmid.Emily@epa.gov>

Subject: Engenia supplemental labeling for states?

Hello Emily,

Not Part of Administrative Record



Jeff

Jeffrey Birk

Product Registration Manager

Phone: +1 919 547-2622, Mobile: [REDACTED] PII [REDACTED], Fax: +1 919 547-2850, Email: jeffrey.birk@basf.com

Postal Address: BASF Corporation, , 26 Davis Drive, 27709-3528 Research Triangle Park, United States



We create chemistry

BASF Corporation